

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-80219-CR-CANNON

UNITED STATES OF AMERICA, )  
Plaintiff, )  
vs. )  
MICHAEL GORDON DOUGLAS, )  
Defendant.. )

## **MOTION FOR VIDEO MEDICAL EXAMINATION AND TREATMENT**

COMES NOW the Defendant, Michael G. Douglas, by and through his undersigned counsel and respectfully requests that this Honorable Court enter its Order directing the Sheriff of St. Lucie County and/or his designee to allow the Defendant to receive medical evaluation and potential treatment via video conference. A neurologist will assess and treat Mr. Douglas' ongoing medical conditions, in accordance with the Eighth Amendment to the United States Constitution.

1. This motion is based on the grounds that: (A) Mr. Douglas is currently suffering from the ongoing effects of what has been medically diagnosed as spinal stenosis; (B) defense counsel has engaged Doctor Noor Yono, MD a licensed Florida

physician, diplomate of the American Board of Psychiatry and Neurology specialist to evaluate Mr. Douglas' current medical condition related to his spinal stenosis diagnosis, prepare a short and medium term prognosis, and an opinion on the need for treatment; and (C) the staff of St. Lucie County Jail have requested that Mr. Douglas present a Court Order allowing him to receive outside medical treatment and/or evaluation in the form of a video call.

2. Mr. Douglas was transferred from the Southern District of California, after three (3) months in custody in that District. While in the Southern District of California, Mr. Douglas was taken to University of San Diego Health (UCSD) Hospital for evaluation. During an examination at UCSD Health, it was determined that he suffered from the condition of spinal stenosis. Mr. Douglas was subsequently transferred to St. Lucie County Jail ("Jail") and has reported developing increasing symptoms related to spinal stenosis, including but not limited to the following: pain in his hands and feet, shooting pain in his spine, migraines, swollen body and limbs, dizziness, and loss of feeling in his limbs. All of the foregoing prior diagnosis is contained in the sealed medical records of the Defendant.

3. The Defendant has made financial arrangements with Dr. Yono and therefore neither the U.S. Marshals nor the Sheriff will incur any related expenses.

4. Pursuant to Local Rule 88.9, counsel have conferred and AUSA Gregory Schiller has authorized the undersigned to advise the Court that the Government does not object to the relief sought herein.

WHEREFORE the Defendant Respectfully requests that this Honorable Court enter its Order directing the Sheriff of St. Lucie County, and/or his designee to allow the Defendant to be examined by Dr. Yono via confidential video conference or a similar video platform to determine his present condition, the current progression of his spinal stenosis, his short and medium term prognosis and the need for treatment.

DATED this 9<sup>th</sup> day of April, 2024.

/s/ John D. Kirby, Esq.

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#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Video Medical Examination and Treatment has been furnished by Electronic Delivery using CM/ECF and to Assistant United States Attorney Gregory Schiller, Esq. at [Gregory.schiller@usdoj.gov](mailto:Gregory.schiller@usdoj.gov), to John D. Kirby, Esq. at

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jkirby@johnkirbylaw.com and by Regular Mail to Sheriff Keith Pierson, 4700 W Midway Road, Fort Pierce, FL 34981 and to the U.S. Marshals Service at 300 S. 6<sup>th</sup> St., Fort Pierce, FL 34950 this 9<sup>th</sup> day of April, 2024.

*John R. Howes, Esq.*  
John R. Howes, Esq.